UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 06 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7648 7214
RETURN RECEIPT REQUESTED

Mr. Jim Ulizzi
Safety, Health, and Environmental Coordinator
ThorWorks Industries, Inc.
2520 South Campbell Street
Sandusky, Ohio 44870

Re: Notice of Violation
Compliance Evaluation Inspection
OHD 987 047 446

Dear Mr. Ulizzi:

On May 12, 2015 representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (Ohio EPA) inspected the ThorWorks Industries, Inc. facility located in Sandusky, Ohio (ThorWorks). As a small quantity generator of hazardous waste, Thorworks is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate ThorWork's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by ThorWorks, EPA's review of records pertaining to Thorworks, and the inspector's observations, EPA has determined that ThorWorks has unlawfully stored hazardous waste without a permit or interim status as a result of ThorWorks' failure to comply with certain conditions for a permit exemption under Ohio Admin. Code § 3745-52-34(D)-(F) [40 C.F.R. § 262.34(d)-(f)]. EPA has identified the permit exemption conditions with which ThorWorks was out of compliance at the time of the inspection in paragraphs 1-3, below.

Based on information provided by ThorWorks, EPA's review of records pertaining to ThorWorks, and the inspector's observations, EPA has determined that ThorWorks violated RCRA requirements related to hazardous waste determinations, wastes reclaimed under a contractual agreement, used oil and universal waste, as described in paragraphs 4-7, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS

At the time of the inspection, ThorWorks was out of compliance with the following small quantity generator permit exemption conditions:

1. Hazardous Waste Satellite Accumulation Area Container Labeling

Under Ohio Admin. Code § 3745-52-34(C)(1) [40 C.F.R. § 262.34(c)(1)], a generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste listed in paragraph (E) of rule 3745-51-33 of the Administrative Code in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit and without complying with paragraph (A) of this rule provided he: (a) Complies with rules 3745-66-71, 3745-66-72, and paragraph (A) of rule 3745-66-73 of the Administrative Code; and (b) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

At the time of the inspection, a satellite accumulation container (SAA) in the Fabrication/Weld Shop Paint Shop area (see photograph number 2) and a SAA container in the ThorSports Race Shop Paint Mixing Room (see photograph number 10) were not labeled "Hazardous Waste" or other content-identifying words.

2. Inspection Logs

Under Ohio Admin. Code § 3745-52-34 (D)(2), a small quantity generator must comply with the requirements of 3745-66-70 to 3745-66-74 and rule 3745-66-77 of the Administrative Code. Specifically, the owner or operator must record inspections in an inspection log or summary. He must keep these records for at least three years from the date of inspection. At a minimum these records must include the date and time of the inspections, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial action.

At the time of the inspection, ThorWorks had not maintained a weekly inspection log.

3. Telephone Posting

Under Ohio Admin. Code § 3745-52-34(D)(5)(b), a small quantity generator must post the following information next to the telephone: (i). The name and telephone number of the emergency coordinator; (ii). Location of fire extinguishers and spill control material, and, if present, fire alarm; and (iii). The telephone number of the fire department, unless the facility has a direct alarm.

At the time of the inspection, ThorWorks had not posted the required information next to a telephone.

Summary: By failing to comply with the conditions for a permit exemption, above, ThorWorks became an operator of a hazardous waste storage facility, and was required to obtain an Ohio hazardous waste storage permit. ThorWorks failed to apply for such a permit. ThorWorks' failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ohio Admin. Code §§ 3745-50-45(A) and 3745-50-41(A) and (D) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

OTHER VIOLATIONS

ThorWorks violated the following generator requirements:

4. Hazardous Waste Determination

Under Ohio Admin. Code § 3745-52-11 [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous.

At the time of the inspection, ThorWorks had not made a determination whether the Fabrication/Weld Shop paint booth filters, ThorSports paint booth filters, and ThorSports spent blast media were hazardous.

Since the inspection, ThorWorks provided TestAmerica Analytical Reports to EPA on the ThorSports Paint Wipes, ThorWorks Paint Booth Filters, ThorSports Paint Booth Filters, and ThorSports Blast Media.

5. Wastes Reclaimed Under a Contractual Agreement

Under Ohio Admin. Code § 3745-52-20(F)(1) and (2) [40 C.F.R. § 262.20(e)(1) and (2)], when the waste is reclaimed under a contractual agreement, the type of waste and frequency of shipments must be specified in the agreement and the generator must maintain a copy of the reclamation agreement in his files for a period of at least three years after termination or expiration of the agreement.

During the inspection, ThorWorks personnel told the inspectors that the used parts washer solutions were being handled by Safety-Kleen under the "Continued Use Program." However, ThorWorks did not have a signed Safety-Kleen "Continued Use Program Customer Notification and Certification Form."

6. Used Oil Requirement

Under Ohio Admin. Code § 3745-279-22(C)(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

At the time of the inspection, at least six 55-gallon containers of used oil, located in the ThorWorks central accumulation area, maintenance garage, Patch Plant, and ThorSports shop (see photograph numbers 1, 5, 6, 7, and 11), were not labeled with the words, "Used Oil."

7. Universal Waste Requirement

Under Ohio Admin. Code § 3745-273-13(D) [40 C.F.R. § 273.13(d)], a small quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

ThorWorks is a small quantity handler of universal waste because it does not accumulate 5,000 kilograms or more of universal waste at any time. At the time of the inspection, ThorWorks' could not explain to the inspectors how used lamps are handled. During the January 27, 2009 Ohio EPA inspection, ThorWorks had disposed of used fluorescent lamps in the trash. Since the 2015 inspection, ThorWorks has notified EPA that Safety-Kleen has "now set up a Universal Waste program for our Used Fluorescent Lamps".

At this time, EPA is not requiring ThorWorks to apply for an Ohio hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1-3, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and hazardous waste determination, wastes reclaimed under a contractural agreement, used oil labeling and universal waste off-site shipments. You should submit your response to Walt Francis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Walt Francis, of my staff, at 312-353-4921 or at francis.walt@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Ed Pulido, Ohio EPA (Edgar.Pulido@epa.ohio.gov)
Teri Finfrock, Ohio EPA (Teri.Finfrock@epa.ohio.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**THORWORKS INDUSTRIES, INC.**
FACILITY U.S. EPA ID NO.:	**OHD 987 047 446**
FACILITY TYPE:	**Small Quantity Generator**
FACILITY ADDRESS:	2520 South Campbell Street Sandusky, Ohio 44870
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE OF INSPECTION:	May 12, 2015
SIC CODE:	2951 – Paving Mixtures and Block
NAICS CODES:	324121 – Asphalt Paving Mixture and Blocks Manufacturing 32551 – Paint and Coatings Manufacturing

PREPARED BY: _____ 5/26/2015
Walt Francis **Date**
Environmental Scientist

APPROVED BY: _____ 5/26/2015
Julie Morris, Chief **Date**
Compliance Section 2
RCRA Branch

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the Thorworks Industries, Inc. (Thorworks) facility located at 2520 South Campbell Street, Sandusky, Ohio to determine compliance with the Resource Conservation and Recovery Act (RCRA) and the Ohio Administrative Code (OAC), with respect to Thorworks' management of hazardous waste, universal waste and used oil.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Ohio Environmental Protection Agency (Ohio EPA) Inspector –
Ed Pulido, Environmental Specialist

Representatives of Thorworks Industries, Inc. -
Jim Ulizzi, Safety, Health and Environmental Coordinator
Ron Brooker, Research and Development

Site Description/Background Information

The Thorworks facility is located at 2520 South Campbell Street, Sandusky, Ohio and manufactures: road surface and sport surface sealers; road application equipment; road patch; traffic paint; and Thorsports race pickup trucks. Operations include: Equipment Fabrication Division; Sealer Retail Department; Patch Plant; Color/Acrylics Department; Maintenance Department; Garage Area; Research and Development Laboratory; and the Thorsports Racing Shop. Thorworks has two other locations in Ohio, JetCoat located in Columbus, Ohio and Century Products located in Youngstown, Ohio. The Sandusky, Ohio facility generates: waste paint related waste and distillation still bottoms (F003/F005/D001/D005/D006/D018); used spray booth filters; used parts washer solvents; used parts washer corrosive liquid (D006/D008/D027/D039/D040); and waste amines corrosive (D002). On October 9, 1992, Thorworks submitted an EPA Notification Form 8700-12 as a Small Quantity Generator (SQG) of hazardous waste. In addition, used oil is generated throughout the plant and collected in 55-gallon containers. Also, used lead acid batteries are sent off-site for recycling. Used fluorescent lamps are accumulated in the Maintenance Shop. Used aerosol cans are placed in the general trash. Thorworks has been at this location since 1990, and currently has approximately 250 employees, and operates two shifts.

At the time of the inspection, the Thorworks facility was operating as a SQG of hazardous waste. Historical hazardous waste streams have included off-site shipments of: spent solvents and paint related waste (D001/F003/F005/D005/D006/D018); spent booth filters (D007); spent carburetor cleaner (D002/D018/D027/D039/D040); and spent solvents from parts washers. Other historical wastes include: 1) used oil; 2) used fluorescent lamps; and 3) used lead acid batteries.

Opening Conference

U.S. EPA representative Walt Francis and Ohio EPA representative Ed Pulido arrived at the Thorworks, Sandusky, Ohio facility at approximately 8:55 a.m. Inspector Francis and Inspector Pulido introduced themselves to Mr. Jim Ulizzi. Mr. Ulizzi took the inspectors to a nearby conference room. Inspector Francis presented his credentials to Mr. Ulizzi, and informed him of the nature, scope, and procedures of the inspection. The inspection was conducted by U.S. EPA and Ohio EPA. Mr. Ulizzi provided the inspectors with a brief overview of the facility, and provided information on the various waste streams. Mr. Ron Brooker from the Research and Development Laboratory arrived at the conference room. Inspector Francis asked Mr. Brooker about Thorworks receiving used solvents. Mr. Brooker told the inspectors that used solvents from Heritage Crystal Clean were received at the Thorworks JetCoat facility in Columbus, Ohio to be used in the manufacturing of shingles. Mr. Ulizzi did not make a confidential business information claim on the information gathered during the inspection. Mr. Ulizzi allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began in the Thorworks Research and Development Laboratory. Mr. Brooker showed the inspectors how waste from the laboratory is recycled into coal tar sealer on-site. In addition, Mr. Brooker told the inspectors that any hazardous waste generated from the laboratory is taken over to the central accumulation area. Also, Mr. Brooker told the inspectors that the Sealmaster products are all water based. The walk-through continued to the Fabrication/Weld Shop. Mr. Ulizzi introduced Mr. Ron Landis, Supervisor of the Fabrication/Weld Shop to the inspectors. Mr. Landis showed the inspectors a 55-gallon container of used oil. Inspector Francis noted the container was not labeled "Used Oil", see photograph number 1. In addition, Inspector Francis observed a used lead acid battery in this area. Mr. Landis told the inspectors that used lead acid batteries are exchanged at Crown Battery. The walk-through continued to the Paint Shop clean-up area. Mr. Landis showed the inspectors a Safety-Kleen solvent spray gun washer and cleaner which utilizes "Heavy Duty Lacquer #6782", see photograph number 2. Mr. Landis showed the inspectors a Safety-Kleen distillation apparatus and a container for accumulation of plastic bags of distillation bottoms, see photograph number 3. Inspector Francis noted that the container was not labeled "Hazardous Waste", see photograph number 3. The walk-through continued to the paint spray booth. Inspector Pulido asked Mr. Landis how the used spray booth filters were handled. Mr. Landis told the inspectors that the used filters are placed in the general trash, see photograph number 4. The walk-through continued to the Seal Retail Department. Mr. Ulizzi introduced Mr. Greg Braden, Supervisor of the Seal Retail Department. Mr. Braden showed the inspectors a wastewater pit which was used for accumulation of "Letdown water". In addition, Mr. Braden showed the inspectors tanks utilized for limestone, additives, sand, asphalt, and tar. Mr. Braden told the inspectors that his department does not generate any hazardous waste. The walk-through continued to the Maintenance Shop. Mr. Ulizzi introduced Mr. George Sharp, Maintenance Supervisor. Mr. Sharp told the inspectors that he does have an area for accumulation of used fluorescent lamps. However, the area was empty. Inspector Francis asked Mr. Sharp how used aerosol cans are handled. Mr. Sharp told the inspectors that any empty aerosol cans are placed in the general

trash. The walk-through continued to the central accumulation area near the Maintenance Department. Mr. Ulizzi showed the inspectors a 55-gallon container labeled "Waste Oil, 8/20/14 and a 55-gallon container labeled "Binder R7105", see photograph number 5. Inspector Francis did not observe any hazardous waste in this area. Mr. Ulizzi told the inspectors that Thorworks had recently shipped hazardous off-site. The walk-through continued to the Acrylics Plant. Mr. Ulizzi introduced Mr. Steve Rohlf, Supervisor of the Acrylics Plant. Mr. Rohlf showed the inspectors 250-gallon totes of wastewater which contained cleanout water when changing colors. Mr. Rohlf also showed the inspectors several latex storage tanks. The walk-through continued to the Patch Plant. Mr. Ulizzi introduced Mr. Don Stokes, Supervisor of the Patch Plant. Mr. Stokes showed the inspectors how asphalt and aggregate are combined and placed in plastic bags. Inspector Francis observed a green 55-gallon container. Mr. Stokes told Inspector Francis that the container was utilized for used gear case oil. Inspector Francis noted that the container was not labeled "Used Oil", see photograph number 6. The walk-through continued to the Garage. Mr. Ulizzi introduced Mr. Denny Brady, Supervisor of the Garage. Mr. Brady showed the inspectors a 55-gallon container of used oil, see photograph number 7. In addition, Mr. Brady showed the inspectors a parts washer. Mr. Brady told the inspectors that used lead acid batteries are taken to Crown Battery for exchange. Inspector Pulido observed some aerosol cans in a container. Mr. Brady told the inspectors that used aerosol cans are sent off-site for metal recovery. The walk-through continued to the Stock Room Area. Mr. Ulizzi told the inspectors that used rags are shipped of-site with the trash. The walk-through continued to the Thorsports Race Shop. Mr. Ulizzi told the inspectors that Mr. David Pepper was the Race Shop Supervisor, but was probably out for lunch. Mr. Ulizzi showed the inspectors a Safety-Kleen parts washer filled with Safety-Kleen "Premium Solvent", and two corrosive parts cleaners labeled "Corrosive", see photograph number 8. The walk-through continued to an aqueous agitating parts cleaner labeled "ArmaKleen 4 in 1 Cleaner" and a mediablast unit, see photographs 8 and 9. Inspector Francis asked Mr. Ulizzi how the used blast media was handled. Mr. Ulizzi told the inspectors that he would follow-up with Mr. Pepper. The walk-through continued to the second floor. Mr. Ulizzi showed the inspectors another Safety-Kleen parts washer labeled "Premium Solvent". The walk-through continued to the paint spray booth area. Mr. Ulizzi showed the inspectors the spray booths. The inspectors asked Mr. Ulizzi how the used spray booth filters were handled. Mr. Ulizzi told the inspectors that the used spray booth filters were placed in the general trash. The walk-through continued to the Paint Mixing Room. Mr. Ulizzi showed the inspectors a Safety-Kleen gun cleaning device, a Safety-Kleen distillation apparatus and a 5-gallon waste container, see photograph number 10. Inspector Francis observed a 5-gallon container of "Heavy Duty Lacquer Thinner 6782". Mr. Ulizzi showed the inspectors another Safety-Kleen parts washer labeled "Premium Solvent". The walk-through continued to the Supply Room. Mr. Ulizzi showed the inspectors two 55-gallon containers of used oil, an area where used rags accumulate, and a trash container with used empty aerosol cans, see photograph numbers 11, 12, and 13.

The inspection group then returned to the conference room to review records.

Records Review

Mr. Ulizzi provided the inspectors with waste determination records, four years of hazardous waste manifests, a recent used oil bill of lading. Mr. Ulizzi told the inspectors that weekly inspections were not being conducted or recorded in a log.

The waste determinations were performed by Safety-Kleen. Mr. Ulizzi did not have waste determination records for the used spray booth filters or the used blast media. Inspector Francis noted that the last out-bound shipment of hazardous waste was on May 1, 2015 to Safety-Kleen, Smithfield, Kentucky (KYD053340108). Used oil was picked up by Safety-Kleen and shipped to Spring Grove Resource Recovery, Inc., Cincinnati, Ohio (OHD000816629). Mr. Ulizzi did not have any records for off-site shipments of used lamps. Mr. Ulizzi told the inspectors that the used parts washer solvents are picked up by Safety-Kleen under the "Continued Use Program."

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. Thorworks Industries would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists and a copy of the photographs taken during the inspection. Inspector Francis discussed used oil labeling, the off-site shipment of the distillation still bottoms, and weekly inspection logs. Inspector Pulido mentioned the waste determinations on the used paint booth filters and the last shipment of used fluorescent lamps. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, a U.S. EPA Managing Used Oil Advice for Small Businesses fact sheet, and an Ohio EPA Pollution Prevention Assistance brochure to Mr. Ulizzi.

Attachments

Inspection Checklists.
Photographs.

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Company: Thorworks Industries, Inc. EPA ID#: OHD 987 047 446

Street: 2520 South Campbell Street City: Sandusky

County: Erie State: Ohio Zip: 44870

Mailing Address: Same
(If different from above)

Telephone: 419-626-4375 Fax #: 419-626-5477

Owner/ Operator: Sealmaster, Inc.
(If different from above)

Street:

City: State: Ohio Zip:

Inspection Date(s): 5/12/2015 Time(s):

Inspection Announced? ____ Yes ___X___ NO If so, how much advance notice given?

	Name	Affiliation	Telephone
Inspectors:	Walt Francis	U.S. EPA	312-353-4921
	Ed Pulido	Ohio EPA	419-373-3015
Facility Representative:	Jim Ulizzi	Thorworks Industries	419-626-4375

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
____ Conditionally Exempt SQG (CESQG)	_X_ Containers
_X_ Small Quantity Generator (SQG)	____ Tank(s)
____ Large Quantity Generator (LQG)	_X_ Land Disposal Requirements (LDR)
____ No Generation	_X_ Used Oil
	_X_ Universal Waste
	____ Other

CESQG:< 100 Kg. (approximately 25-30 gallons) of waste in a calendar month
SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month
NOTE: *To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds*

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

NOTE TO THE INSPECTOR

SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

#		Requirement	Yes	No	N/A
GENERAL REQUIREMENTS					
1.		Have all wastes generated at the facility been adequately evaluated? [3745-52-11] [illegible]	[ ]	[X]	[ ]
2.		Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	[X]	[ ]	[ ]
3.		Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	[ ]	[X]	[ ]
4.		Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	[ ]	[X]	[ ]
5.		Does the generator accumulate hazardous waste?	[X]	[ ]	[ ]
NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.					
6.		Has the generator accumulated hazardous wastes <u>in excess of</u> (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	[ ]	[X]	[ ]
NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]					
7.		Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	[ ]	[X]	[ ]
NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.					
8.		Does the generator treat hazardous waste in a:			
	a.	Container that meets 3745-66-70 to 3745-66-77?	[ ]	[X]	[ ]
	b.	Tank that meets 3745-66-101?	[ ]	[X]	[ ]
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	[ ]	[X]	[ ]
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	[ ]	[X]	[ ]
NOTE: Complete appropriate checklist for each unit.					
NOTE: If waste is treated to meet LDRs, use LDR checklist.					
MANIFEST REQUIREMENTS					
9.		Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)]	[X]	[ ]	[ ]
10.		Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)] Safety-Kleen Contract use.	[X]	[ ]	[ ]
	a.	Does the contractual agreement specify the type of waste and frequency of shipment? No contract [illegible]	[ ]	[X]	[ ]
	b.	Is the transport vehicle owned and operated by the reclaimer?	[X]	[ ]	[ ]

	c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes ☐ No ☒ N/A ☐
NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.			
11.		Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes ☒ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20(A)(1)]			
12.		Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☒ No ☐ N/A ☐
NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]			
13.		If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐ No ☐ N/A ☒
14.		Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes ☒ No ☐ N/A ☐
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.			
15.		If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]	Yes ☐ No ☐ N/A ☒
16.		Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes ☒ No ☐ N/A ☐
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
PREPAREDNESS AND PREVENTION			
17.		Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes ☒ No ☐ N/A ☐
18.		Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]	
	a.	Name and telephone number of emergency coordinator? Jim or Dave	Yes ☐ No ☒ N/A ☐
	b.	Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes ☐ No ☒ N/A ☐
	c.	Telephone number of local fire department? Perkins - Township	Yes ☐ No ☒ N/A ☐
19.		Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)] Hazard Comm.	Yes ☒ No ☐ N/A ☐
20.		Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]	Yes ☐ No ☐ N/A ☒
21.		Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes ☒ No ☐ N/A ☐
22.		Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:	
	a.	Internal Alarm system? [3745-65-32(A)]	Yes ☒ No ☐ N/A ☐

	b.	Emergency communication device? [3745-65-32(B)]	Yes ☒ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]?	Yes ☒ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☒ No ☐ N/A ☐
23.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] PSLO	Yes ☒ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-65-33]	Yes ☐ No ☒ N/A ☐
24.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (*unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)]*	Yes ☒ No ☐ N/A ☐
25.		If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (*unless not required under OAC 3745-65-32*)? [3745-65-34(B)]	Yes ☒ No ☐ N/A ☐
26.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes ☒ No ☐ N/A ☐
27.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes ☒ No ☐ N/A ☐
28.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes ☐ No ☐ N/A ☒
SATELLITE ACCUMULATION AREA REQUIREMENTS			
29.		Does the generator ensure that satellite accumulation area(s):	
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☒ No ☐ N/A ☐
	f.	Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☐ No ☒ N/A ☐
30.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes ☐ No ☒ N/A ☐
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☒ No ☐ N/A ☐
	b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☒
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.			
USE AND MANAGEMENT OF CONTAINERS			
31.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)] (no waste on site)	Yes ☐ No ☐ N/A ☒

32.	Is the accumulation date on each container? [3745-52-34(D)(4)]		Yes ☐ No ☐ N/A ☒
33.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☐ No ☐ N/A ☒
	b.	In good condition? [3745-66-71]	Yes ☐ No ☐ N/A ☒
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☐ No ☐ N/A ☒
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☐ No ☐ N/A ☒
NOTE: Record location on process summary sheets and photograph the area.			
34.	Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days.		Yes ☐ No ☒ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☐ No ☒ N/A ☐
35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes ☒ No ☐ N/A ☐
36.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes ☐ No ☐ N/A ☒
37.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]		Yes ☐ No ☐ N/A ☒
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.			
PRE-TRANSPORT REQUIREMENTS			
38.	Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]		Yes ☒ No ☐ N/A ☐
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]		Yes ☐ No ☐ N/A ☒
40.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]		Yes ☒ No ☐ N/A ☐

GENERATOR LDR CHECKLIST DOES NOT APPLY TO CESQGS				
GENERAL REQUIREMENTS				
1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]			Yes ☐ No ☐ N/A ☒
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,			Yes ☐ No ☐ N/A ☒
	a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]		Yes ☒ No ☐ N/A ☐
NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).				
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]			Yes ☒ No ☐ N/A ☐
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]			Yes ☒ No ☐ N/A ☐
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,			Yes ☒ No ☐ N/A ☐
	a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]		Yes ☒ No ☐ N/A ☐
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.				
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]			Yes ☒ No ☐ N/A ☐
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.				
NOTE: Written documentation of this determination is not required.				
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?			Yes ☐ No ☒ N/A ☐
NOTE: If "Yes" see question #16.				
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]			Yes ☒ No ☐ N/A ☐
	a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:		Yes ☐ No ☐ N/A ☒
		i	Applicable HW codes?	Yes ☐ No ☐ N/A ☐
		ii	Manifest number of the first shipment to the TSD?	Yes ☐ No ☐ N/A ☐
		iii	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."?	Yes ☐ No ☐ N/A ☐
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]			Yes ☒ No ☐ N/A ☐
10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]			Yes ☒ No ☐ N/A ☐

	a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes ☒ No ☐ N/A ☐
NOTIFICATION FORM			
11.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.			
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories			
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.			
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.			
PROHIBITED DILUTION			
12.	Is the HW treated by burning? H061, H040, H070 [illegible] If "No" go to #15.		Yes ☒ No ☐ N/A ☐
13.	Is the HW a metal-bearing HW?		Yes ■ No ☒ N/A ☐
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.			
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)]	
		i. Contains > 1% TOC?	Yes ☐ No ☐ N/A ☒
		ii. Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes ☐ No ☐ N/A ☒
		iii. Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☒
		iv. Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☐ No ☐ N/A ☒
		v. Co-generated with a HW that must be combusted?	Yes ☐ No ☐ N/A ☒
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes ☐ No ☐ N/A ☒

15.	Was the HW treated by wastewater treatment?			Yes ☐ No ☑ N/A ☐
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]		Yes ☐ No ☐ N/A ☐
NOTE: If "Yes", HW is improperly being treated by dilution.				
	b.	Does the waste carry the D001 code and contain ≥10% TOC?		Yes ☐ No ☐ N/A ☐
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?		Yes ☐ No ☐ N/A ☐
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				
GENERATOR TREATMENT				
16.	Does the generator treat to meet LDRs on-site?			Yes ☐ No ☑ N/A ☐
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?			Yes ☐ No ☐ N/A ☐
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.			
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]		Yes ☐ No ☐ N/A ☐
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]		Yes ☐ No ☐ N/A ☐
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.				
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]		Yes ☐ No ☐ N/A ☐
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]		Yes ☐ No ☐ N/A ☐
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]		Yes ☐ No ☐ N/A ☐
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]		Yes ☐ No ☐ N/A ☐
NOTIFICATION FORM FOR GENERATOR TREATMENT				
17.	a.	Contains all information in #11 a-g above and		Yes ☐ No ☐ N/A ☐
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."		Yes ☐ No ☐ N/A ☐
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:		
		i.	Prepare a one-time notification? [3745-270-09 (D)]	Yes ☐ No ☐ N/A ☐
		ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes ☐ No ☐ N/A ☐
		iii.	Include in the notification: [3745-270-09(D)]	

			1.	Name & address of receiving landfill?	Yes ☐ No ☐ N/A ☐
			2.	Description of HW when generated?	Yes ☐ No ☐ N/A ☐
			3.	HW code when generated?	Yes ☐ No ☐ N/A ☐
			4.	Treatability group when generated?	Yes ☐ No ☐ N/A ☐
			5.	Underlying hazardous constituents present when generated?	Yes ☐ No ☐ N/A ☐
		iv.	Contain the certification statement as required by 3745-270-07(B)(4)?		Yes ☐ No ☐ N/A ☐

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS			
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more			
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less			
PROHIBITIONS			
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)] no bills of lading.		Yes ☒ No ☐ N/A ☐
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]		Yes ☐ No ☒ N/A ☐
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES			
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]		Yes ☐ No ☐ N/A ☒
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]		Yes ☐ No ☐ N/A ☐
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]		Yes ☐ No ☐ N/A ☐
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]		Yes ☐ No ☐ N/A ☐
	a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes ☐ No ☐ N/A ☐
	b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes ☐ No ☐ N/A ☐
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)]		Yes ☐ No ☐ N/A ☐
UNIVERSAL WASTE PESTICIDES			
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]		Yes ☐ No ☐ N/A ☐
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]		Yes ☐ No ☐ N/A ☐
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]		Yes ☐ No ☐ N/A ☐
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]		Yes ☐ No ☐ N/A ☐
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)(1)&(2)]		Yes ☐ No ☐ N/A ☐
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)]		Yes ☐ No ☐ N/A ☐

UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT			
14.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]		Yes ☐ No ☐ N/A ☐
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]		
	a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes ☐ No ☐ N/A ☐
	b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes ☐ No ☐ N/A ☐
	c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes ☐ No ☐ N/A ☐
	d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes ☐ No ☐ N/A ☐
	e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes ☐ No ☐ N/A ☐
	f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes ☐ No ☐ N/A ☐
16.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]		Yes ☐ No ☐ N/A ☐
	a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	Yes ☐ No ☐ N/A ☐
	b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	Yes ☐ No ☐ N/A ☐
17.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]		Yes ☐ No ☐ N/A ☐
	a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	Yes ☐ No ☐ N/A ☐
18.	Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]		Yes ☐ No ☐ N/A ☐
19.	Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14(D)(2)]		Yes ☐ No ☐ N/A ☐

UNIVERSAL WASTE LAMPS			
20.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]		Yes ☐ No ☐ N/A ☒
21.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] (No lamps)		Yes ☐ No ☐ N/A ☒
NOTE: ***Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].*** *A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*			
22.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]		Yes ☐ No ☐ N/A ☒
ACCUMULATION TIME			
23.	Is the waste accumulated for less than one year? [3745-273-15(A)]		Yes ☐ No ☐ N/A ☒
	a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes ☐ No ☐ N/A ☒
NOTE: Accumulation is defined as date generated or date received from another handler.			
24.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below:		Yes ☐ No ☐ N/A ☒
EMPLOYEE TRAINING			
25.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]		Yes ☒ No ☐ N/A ☐
RESPONSE TO RELEASES			
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]		Yes ☒ No ☐ N/A ☐
27.	Is the material released characterized? [3745-273-17(B)]		Yes ☒ No ☐ N/A ☐
28.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]		Yes ☒ No ☐ N/A ☐
OFF-SITE SHIPMENTS			
NOTE: If a SQUWH self-transports waste, then the handler must comply with the Universal Waste transporter requirements.			
29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] (No offsite shipments today)		Yes ☐ No ☒ N/A ☐

30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.		Yes ☒ No ☐ N/A ☐
31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]		Yes ☒ No ☐ N/A ☐
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes ☒ No ☐ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	Yes ☐ No ☐ N/A ☒
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do one of the following:		Yes ☐ No ☐ N/A ☒
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	Yes ☐ No ☐ N/A ☑
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]		Yes ☐ No ☐ N/A ☒
EXPORTS			
35.	Is waste being sent to a foreign destination? If so:		Yes ☐ No ☒ N/A ☐
	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes ☐ No ☐ N/A ☐
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes ☐ No ☐ N/A ☐
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes ☐ No ☐ N/A ☐

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS			
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		Yes ☐ No ☒ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☒
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes ☐ No ☒ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☐ No ☐ N/A ☒
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			
GENERATOR STANDARDS			
4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☐ No ☒ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☒
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]		Yes ☐ No ☐ N/A ☒
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes ☐ No ☒ N/A ☐
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes ☒ No ☐ N/A ☐
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]		Yes ☐ No ☒ N/A ☐
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☒ No ☐ N/A ☐
	a.	Stopped the release?	Yes ☒ No ☐ N/A ☐
	b.	Contained the release?	Yes ☒ No ☐ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☒ No ☐ N/A ☐
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☒ No ☐ N/A ☐
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		NO
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes ☐ No ☐ N/A ☒

	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☒
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☒
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.		Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] SAEny-Illum -	Yes ☒ No ☐ N/A ☐
12.		If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☒ N/A ☐
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☒
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
13.		Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes ☐ No ☐ N/A ☒
14.		Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes ☐ No ☐ N/A ☒
15.		Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes ☐ No ☐ N/A ☒
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			

Thorworks Industries, Inc.
Sandusky, Ohio
5/12/2015

Photograph #1 – Fabrication/Weld Shop - 55-Gallon Container of Used Oil

Photograph #2 – Fabrication/Weld Shop Painting Area – Safety-Kleen Paint Gun Cleaner, Safety-Kleen Distillation Apparatus, Distillation Bottoms Container and 5-Gallon Container of Heavy Duty Lacquer Thinner #6782

Thorworks Industries, Inc.
Sandusky, Ohio
5/12/2015

Photograph #3 – Fabrication/Weld Shop Painting Area – Safety-Kleen Distillation Apparatus and Distillation Bottoms Container

Photograph #4 – Fabrication/Weld Shop Painting Area – Spray Booth Filters

Thorworks Industries, Inc.
Sandusky, Ohio
5/12/2015

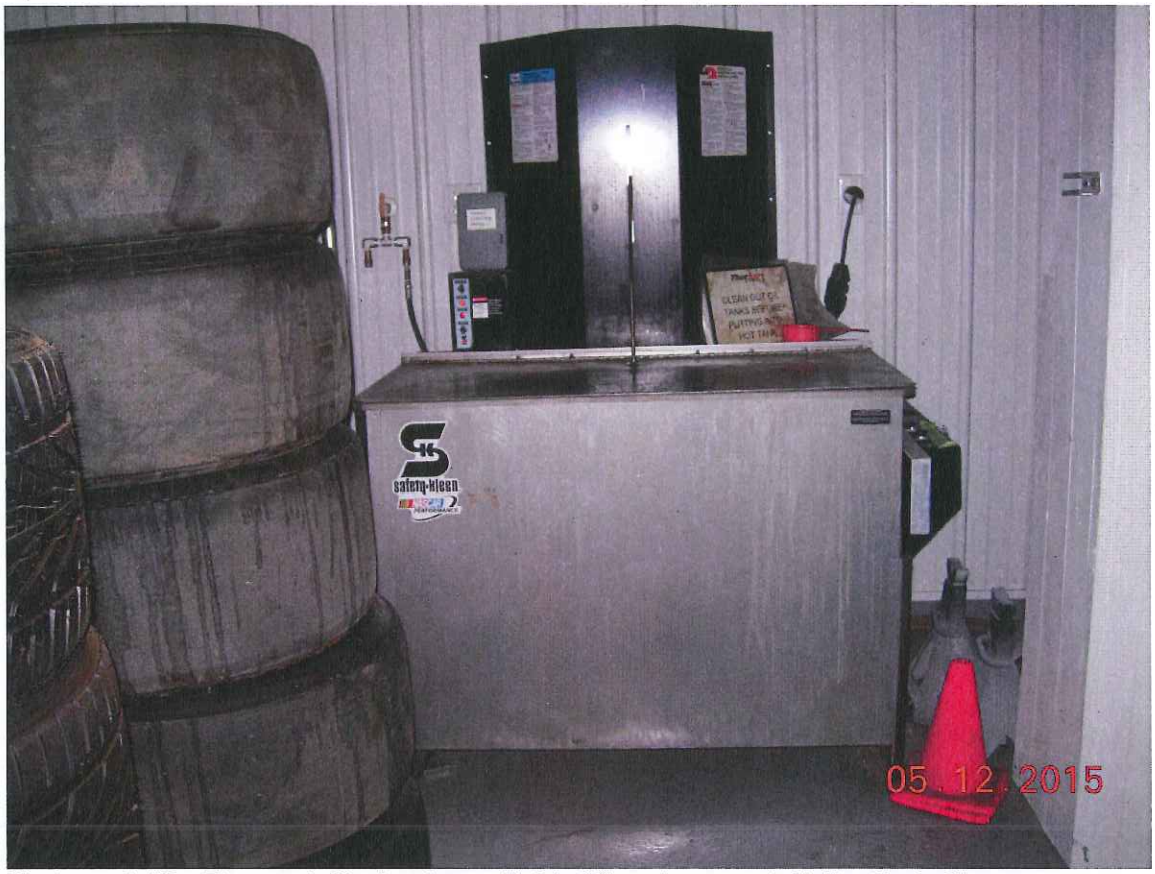
Photograph #5 – Outside of Maintenance Shop/Central Waste Accumulation Area – 55-Gallon Containers of Used Oil.

Photograph #6 – Asphalt Patch Plant – 55-Gallon Container of Used Oil

Thorworks Industries, Inc.
Sandusky, Ohio
5/12/2015

Photograph #7 – Garage Area - 55-Gallon Container of Used Oil

Photograph #8 – Thorsports Racing Area – Safety-Kleen Parts Washer and Two Corrosive Parts Cleaners



Photograph #8 – Thorsports Racing Area – Safety-Kleen Aqueous Agitation Parts Cleaner

Photograph #9 – Thorsports Racing Area – Mediablaster

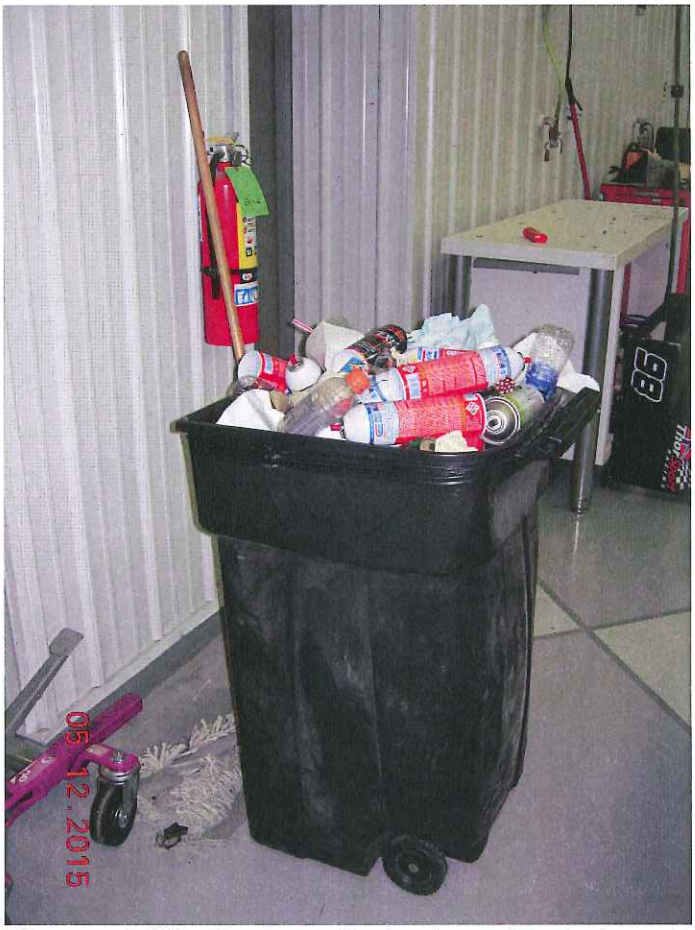
Thorworks Industries, Inc.
Sandusky, Ohio
5/12/2015

Photograph #10 – Thorsports Racing Area – Paint Mixing Room, Spray Gun Cleaner, Safety-Kleen Distillation Apparatus and Waste Container

Photograph #11 – Thorsports Racing Area Stockroom – 55-Gallon Containers of Used Oil

Thorworks Industries, Inc.
Sandusky, Ohio
5/12/2015

Photograph #12 – Thorsports Racing Area Stockroom – Containers of Dirty Rags



Photograph #13– Thorsports Racing Area – Empty Aerosol Cans in Trash